

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

National Labor Relations Board	:	
	:	No. 18-2939
Petitioner,	:	
	:	
v.	:	
	:	NLRB Case 04-CA-196783
Hard Hat Services, LLC,	:	
	:	
Respondent.	:	

ANSWER TO PETITION FOR REVIEW

Hard Hat Services, LLC, hereby serves the following answer to the Petitioner's Application to Enforce the Order.

1. The order at issue was entered by the National Labor Relations Board's ordered entered on June 12, 2018 in case no. finding that Hard Hat violated sections 8(a)(1) and (a)(3) of the National Labor Relations Act for the failure to hire certain job applicants based on their Union affiliation and for coercively interrogating an applicant based upon his Union affiliation.

2. Hard Hat Services denies that the Board is entitled to enforcement of the June 12, 2018 order.

3. Hard Hat Services admits that this Court has jurisdiction over the Board's application.

4. Hard Hat Services admits that this Court is the proper venue for the NLRB's application for enforcement.

5. Hard Hat Services denies that it has committed any unfair labor practice as stated by the NLRB in its application.

Wherefore, Hard Hat Services respectfully requests that this Court deny the Board's application for enforcement.

Respectfully submitted,

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By: /s/Matthew A. Foley

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DATE: September 21, 2018